

# City of Greensboro North Carolina

June 10, 2008

Ms. Jaclynne Drummond  
Hydrogeologist – Environmental Compliance  
NCDENR – Solid Waste Section  
1646 Mail Service Center  
Raleigh, NC 27699



Subject: Selection of Remedies for the White Street Landfill Phase II  
Permit No. 41-03

Dear Ms. Drummond:

S&ME, Inc. prepared a Nature and Extent Study (NES) dated August 28, 2007 and an Assessment of Corrective Measures (ACM) dated August 31, 2007 for Phase II of the White Street Landfill. The ACM was later amended by letter dated March 27, 2008. In accordance with Title 15A NCAC 13B .1635(d), the City of Greensboro held two public meetings with interested and affected parties on December 20, 2007 and June 9, 2008 to discuss the results of the corrective measures assessment.

The potential corrective measures that were identified in the ACM include in situ air sparging / soil vapor extraction, subterranean physical barriers, in situ enhanced bioremediation, groundwater pump and treatment, monitored natural attenuation, phytoremediation, and maintaining a consistent contour with the pre-1988 waste area.

Based on the low risk to human health and the environment and the comments received from the public hearings, the City of Greensboro proposes to select monitored natural attenuation (MNA), phytoremediation, and maintaining a consistent contour within the pre-1988 waste unit (e.g. Phase II) for the selection of remedies for contamination in shallow groundwater. The City of Greensboro has placed a regulatory cap over all MSW which minimizes rain water infiltration and operates an active landfill gas extraction system which typically reduces groundwater contaminants over time. Maintaining consistent contours will further reduce vertical percolation of rain water into the waste mass and minimize the generation of leachate from the landfill.

If the City of Greensboro discovers during continued monitoring activities that MNA and phytoremediation are no longer predicted to reduce the constituents of concern in shallow groundwater to below the 2L standards, then the backup selection of remedy will be used to supplement or replace MNA with groundwater pumping and discharge to the publicly owned treatment works. The effectiveness of MNA will be determined through regular

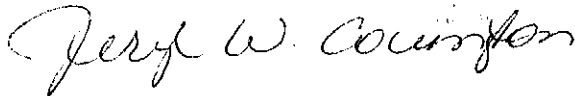
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monitoring of the concentrations of the constituents of concern plus selected indicator parameters which are known to be indicative that MNA is successfully reducing the levels of the constituents of concern discussed in the NES and ACM reports. The MNA indicator parameters, sampling schedule, and timeframe for achieving the 2L remedial goals will be discussed in detail in the upcoming Corrective Action Plan (CAP).

The proposed selection of remedies will be protective of human health and the environment, will return the monitored constituents to below 2L standard levels, and will control the further release of Appendix II constituents from Phase II. Pending the approval of this selection of remedies by NCDENR, the City of Greensboro will submit a corrective action plan (CAP) prior to July 1, 2008.

We appreciate your assistance in this matter. If you should have any questions, please do not hesitate to contact me at (336) 373-2787.

Sincerely,

A handwritten signature in cursive script, reading "Jeryl W. Covington".

Jeryl W. Covington, P.E.  
Director, Environmental Services Department

cc: S&ME Consultants, Inc.